

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

Courtney Boyd #20897 RECEIVED

VS

Dr. Darbouze et. al.,
Defendants

2007 MAR 20 A 9:53

Case No: 2:06-cv-511-WKW

JULIA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

MOTION FOR GOOD CAUSE TO OBTAIN LEAVE OF
THE COURT PURSUANT TO RULE 30(a)(2) FED.R.CIV.

Comes Now, The Plaintiff, Courtney Boyd, moves
into this Honorable Court Pursuant to Rule 30(a)(2) Fed.
R. C.V. Proc. The Plaintiff submits the following in support:

(1) The plaintiff filed a Complaint on 6-06-06 against
the above Defendants for Violating his 8th & 14th Amendment.

(2) Rule 30(a)(2) A party must obtain leave of court,
which shall be granted to the extent consistent with the
principles stated in Rule 26(c)(2). If the person to be examined
is prison or if without the written stipulation of the parties.

(3) The plaintiff have Dunn, King & Associates ~~#1~~ 2800
Zelda Road, Suite 100-2, Montgomery, AL 36106, said that they
will all of the depositions if I get an ~~order~~ order that the costs will
be covered through the court system.

4. The Plaintiff request that he be granted leave, and in Order
Dunn, King & Associates, L.L.C. can take the depositions he
want. So that he may have the defendant under oath for their
testimony at the trial of this case which was filed 11/02/06,
which was filed while the plaintiff was in lock up, which has not
been over one.

So The plaintiff will forward this Court and Dunn, King &
Associates, and the Defendant Counsel once leave is granted,
and a Court Order, is sent to Dunn, King & Associates, Et al
Owner, Ms. Pat Higgins.

6. The plaintiff request a deposition of the following people:
The Defendants Jeanne Darbouze, M.D., Kay Wilson R.N., H.S.A.Y.
and Cynthia Zambles, R.N., Paul Corbier, M.D. et al
Corr. Fac. HCU. Officer [REDACTED] Whithead, Dr. Corbier, and
Officer Whithead will be called as witness because both have
knowledge of the case at hand. Also any witness called by the
Defendant.

Therefore, The plaintiff pray that this Honorable Court
~~grant~~ grant him leave and order the deposition of the above
people.



Certificate OF Service

I hereby Certify that I have served a copy of foregoing
upon Defendant Counsel, by placing it into Easternling Corr.-Fac
on March 19, 2007.

Charles J. Bix

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MONTGOMERY AL 361
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Montgomery #208921 P.M.A.
Courtney Easterling
EASTERLING CORRECTIONAL FACILITY
EASTERLING DRIVE
200 WALLACE DRIVE
CLIO, ALABAMA 36017

District Court for Middle District
P.O. Box 711
Montgomery, AL 36101

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